

EXHIBIT 47

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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STAR AUTO SALES OF : Civil Action No.:
BAYSIDE, INC. (d/b/a : 1:18-cv-05775-ERK-CLP
STAR TOYOTA OF :
BAYSIDE), STAR AUTO :
SALES OF QUEENS, :
LLC (d/b/a STAR :
SUBARU), STAR HYUNDAI :
LLC (d/b/a STAR :
HYUNDAI), STAR NISSAN, :
INC. (d/b/a STAR :
NISSAN), METRO :
CHRYSLER PLYMOUTH :
INC. (d/b/a STAR :
CHRYSLER JEEP DODGE), :
STAR AUTO SALES OF :
QUEENS COUNTY LLC :
(d/b/a STAR FIAT) and :
STAR AUTO SALES OF :
QUEENS VILLAGE LLC :
(d/b/a STAR :
MITSUBISHI), :

Plaintiffs, :

vs. :

VOYNOW, BAYARD, WHYTE :
AND COMPANY, LLP, HUGH :
WHYTE, RANDALL FRANZEN :
AND ROBERT SEIBEL, :

Defendants. :

- - -

FRIDAY, SEPTEMBER 23, 2022

- - -

(Caption continued on page 2.)

Job No. CS5366866

1 UNITED STATES DISTRICT COURT
2 EASTER DISTRICT OF NEW YORK

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5 FRIDAY, SEPTEMBER 23, 2022
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9 Oral Deposition of JOHN KOUFAKIS, taken at
10 Marshall Dennehey, 2000 Market Street, Suite 2300,
11 Philadelphia, Pennsylvania, commencing at 9:24 a.m.,
12 before Lauren Sweeney, a Court Reporter and Notary
13 Public.

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1 A P P E A R A N C E S:

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Representing the Defendants

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15 ALSO PRESENT:

16 RANDALL FRANZEN

17 ROBERT SEIBEL

18 JEREMY KOUFAKIS

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JOHN KOUFAKIS

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1 Q. Do you recall receiving something from Voynow
2 that was in turn then passed on to a third party?

3 A. No. I just don't remember.

4 Q. Okay. It's possible. You just don't remember?

5 MR. FELSEN: Objection.

6 THE WITNESS: It's highly probable. I
7 don't see it signed.

8 BY MS. FITZGERALD:

9 Q. Did you ever receive engagement letters or
10 correspondence from Voynow directed to you for purposes
11 of Star Nissan matters?

12 A. Not that I recall.

13 MS. FITZGERALD: Let's mark this.

14 So off the record.

15 - - -

16 (There was a discussion held
17 off the record.)

18 - - -

19 BY MS. FITZGERALD:

20 Q. Okay. So we've just taken a break and you've
21 had time to confer with your counsel. I understand you
22 want to --

23 A. I confused the words on the tax return of, I
24 think it was 2016, "amended with file." Amended means
25 changed, but I don't know -- I guess file means it would